

Amendments to the Drawing Figures:

The attached drawing sheet include proposed changes to FIG. 2 and replaces the original sheet including FIGs. 1 and 2.

Attachment: Replacement Sheet

REMARKS / DISCUSSION OF ISSUES

Claims 1-19 are pending in the application.

The Office action objects to the drawings, and requires that the drawings include a "controller"; accordingly, a replacement FIG. 2 is attached herein. The replacement drawing adds no new matter because the applicants repeatedly teach that the "drive means 100 are able to control for each pixel" (page 4, line 9; page 4, lines 13-14, et al.), which necessarily implies a controller to effect this control of each pixel.

The Office action rejects claims 13-19 under 35 U.S.C. 112, first paragraph. The applicants respectfully traverse this rejection.

At page 4, lines 9-13, of the specification as filed, the applicants teach:

"The drive means 100 are able to control for each pixel 2 the potential difference to have a picture value to provide the pixels 2 with a respective picture appearance, subsequently to have an inter-picture value to provide the pixels 2 with a respective inter-picture appearance, and subsequently to have a subsequent picture value to provide the pixels 2 with a respective subsequent picture appearance."

Further, although the applicants' claimed invention is not limited to this example, the applicants' timing diagrams of FIGs. 3-4 clearly indicate how the potential differences can be controlled based on the above cited 'picture appearance' and 'subsequent picture appearance' (see page 4, line 21 - page 5, line 16).

Because the applicants clearly teach possession of the elements of claim 13, upon which claims 14-19 depend, at the time the application was filed, the applicants respectfully request the Examiner's reconsideration of the rejection of claims 13-19 under 35 U.S.C. 112, first paragraph.

The Office action rejects claims 7 and 14 under 35 U.S.C. 112, second paragraph. The applicants respectfully traverse this rejection.

The applicants note that FIGs. 3-4 and the accompanying text at page 4, line 21 through page 5, line 16, clearly teach examples of inter-picture values that are equal to one of a set of extreme image values (+/- 15v). Accordingly, the applicants respectfully request the Examiner's reconsideration of the rejection of claims 7 and 14 under 35 U.S.C. 112, second paragraph.

The Office action rejects claims 1-19 under 35 U.S.C. 102(e) over Webber (USPA 2002/0180687). The applicants respectfully traverse this rejection.

"A rejection under U.S.C. 102(b) is proper only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. The identical invention must be shown in as complete detail as is contained in the claim." **MPEP 2131**. "There must be no difference between the claimed invention and the reference disclosure, as viewed by a person of ordinary skill in the field of the invention." **BPAI Opinion No. 2005-2289, October 2005**.

Webber fails to teach a driver that drives each pixel to a picture value that provides the pixel with a respective picture appearance, to an inter-picture value that provides the pixel with a respective inter-picture appearance, and subsequently to a subsequent picture value, as claimed in independent claim 1.

Webber fails to teach applying potential differences corresponding to first picture values, potential differences corresponding to the inter-picture values, and potential differences corresponding to the second picture values, including determining the inter-picture values based on at least the second picture values, as claimed in each of independent claims 6 and 13.

The Office action cites paragraphs in Webber that teach driving the pixels to either a white, gray, or black appearance corresponding to the intended picture, but does not identify where Webber teaches applying inter-picture values, and does not identify where Webber teaches that such inter-picture values are based on the second picture values.

Because Webber fails to teach the elements of each independent claim, and because the Office action fails to identify where Webber teaches the elements of each independent claim, the applicants respectfully maintain that the rejection of claims 1-19 under 35 U.S.C. 102(b) over Webber is unfounded, per MPEP 2131, and should be withdrawn.

In view of the foregoing, the applicants respectfully request that the Examiner withdraw the objection(s) and/or rejection(s) of record, allow all the pending claims, and find the application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,

/Robert M. McDermott/
Robert M. McDermott, Esq.
Reg. 41,508
804-493-0707

Please direct all correspondence to:
Corporate Counsel
U.S. PHILIPS CORPORATION
P.O. Box 3001
Briarcliff Manor, NY 10510-8001